

EXHIBIT B

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
Confidential Michael Haken on 10/02/2020

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION
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IN RE: CAPITAL ONE
CONSUMER DATA SECURITY
BREACH LITIGATION

MDL No. 1:19md2915
(AJT/JFA)

CONFIDENTIAL; SUBJECT
TO PROTECTIVE ORDER

- - -

Videotaped Videoconference Deposition of
MICHAEL HAKEN
(Taken by Plaintiffs)
Kansas City, Missouri
October 2, 2020
CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER
Reported by: Lynne C. Fulwood
Certified Court Reporter

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 2

1 STATE OF GEORGIA

2 COUNTY OF COBB

3 VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF MICHAEL

4 HAKEN

5

6 Pursuant to Article 8.B of the RULES AND
7 REGULATIONS OF THE BOARD OF COURT REPORTING OF THE
8 JUDICIAL COUNCIL OF GEORGIA, I make the following
9 disclosure:

10 I am a Georgia Certified Court Reporter.

11 I am here as a representative of Huseby Global

12 Litigation.

13 Huseby Global Litigation was contacted by
14 the offices of Stueve Siegel Hanson, LLP, to provide
15 court reporting services for this deposition. Huseby
16 Global Litigation will not be taking this deposition
17 by O.C.G.A. 15-14-37 (a) and (b).

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IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
Confidential Michael Haken on 10/02/2020

Page 3

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IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 24

[REDACTED]

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 25

[Redacted Content]

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 26

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IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 46

[Redacted Content]

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 47

[REDACTED]

10 MR. NEWBY: Objection, calls for
11 speculation, incomplete hypothetical. You
12 may answer.

[REDACTED]

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 92

[REDACTED]

23 MR. NEWBY: Objection, form, calls for
24 speculation, incomplete hypothetical.

[REDACTED]

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 93

A horizontal bar chart consisting of 20 black bars. The bars are arranged vertically, one above the other. Their lengths vary significantly, representing a distribution of data. The longest bar is the 10th bar from the top, extending nearly to the right edge of the image. The shortest bar is the 19th bar from the top, which is very thin. The bars are distributed across the vertical space, with some clusters of similar lengths and others with more variation.

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IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION

Confidential

Michael Haken on 10/02/2020

Page 169

[illegible]

[REDACTED]

10 MR. NEWBY: I have no further
11 questions.

12 REEXAMINATION

13 BY MR. VAHLE:

14 Q Mr. Haken, in your testimony just now,
15 did you change any of your previous testimony that
16 you gave under oath today?

17 A I did not.

18 Q And did you change any of your testimony
19 that you gave under oath as a corporate
20 representative of Capital One?

21 A I did not.

22 MR. VAHLE: Nothing further.

23 MR. NEWBY: I have no further recross
24 or redirect I should say.

25 THE VIDEOGRAPHER: This concludes the

1 C E R T I F I C A T E

2 STATE OF GEORGIA:

3 COUNTY OF COBB:

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5 I hereby certify that the foregoing
6 transcript was taken down as stated in the
7 caption and the questions and answers thereto
8 were reduced to typewriting under my direction,
9 that the foregoing pages 1 through 175 represent
10 a true, complete and correct transcript of the
11 evidence given upon said hearing, and I further
12 certify that I'm not of kin or counsel to the
13 parties in the case; am not in the regular employ
14 of counsel of any of said parties; nor am I in
15 anywise interested in the result of said case.

16 This 19th day of October 2020.

17

18

Lynne C. Fulwood

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LYNNE C. FULWOOD,
Certified Court Reporter
State of Georgia
License No. B-1075

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